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May 8, 2020

Via ECF

Hon. Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007

Re: Goat Fashion Limited v. 1661, Inc., Case No. 19-cv-11045-PAE
Letter Motion Requesting Acceptance of Redactions

Dear Judge Engelmayer:

I am counsel of record for Defendant, 1661, Inc., in the captioned action. I write pursuant to Rule 6(B) of Your Honor's Individual Rules and Practices in Civil Cases concerning redactions proposed for materials filed in connection with Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction (filed simultaneously via ECF). Defendant seeks leave for the redactions indicated in the confidential materials emailed to the Court on this date.

The proposed redacted material in Exhibit A and certain places in Defendant's brief includes sensitive, internal business information regarding the number of transactions on Defendant's GOAT® e-commerce platform.

Defendant also seeks leave for several redactions based on Plaintiff's designation of certain items in Exhibit B and the entirety of Exhibit F as Confidential pursuant to the parties' Stipulated Confidentiality Agreement and Protective Order, endorsed by the Court on April 20, 2020 (Dkt. 24). Plaintiff describes the confidential nature of the items proposed to be redacted from Exhibit B as "non-disclosed financial information." Plaintiff describes the confidential nature of the material in Exhibit F as "commercially sensitive non-public information."

Per Rule 6(B), Defendant has filed materials bearing this confidential information in redacted, public form on ECF and has also provided the subject documents in unredacted form (in both clean and highlighted copies) to the Court via email. Exhibit F is composed primarily of image pages that cannot be highlighted. However, Defendant respectfully notes that Plaintiff has designated the entirety of this exhibit as Confidential.

Hon. Paul A. Engelmayer
May 8, 2020
Page 2

Defendant has proposed redactions narrowly tailored to address each party's confidentiality concerns, proposing to redact only as much material necessary to protect the sensitive information described above. Defendant respectfully requests that the Court approve these proposed redactions and files and maintain the unredacted copies under seal, pursuant to Rule 6(B).

I am available at the Court's convenience to answer any questions regarding this request.

Respectfully submitted,

/s/ Lynn E. Rzonca

Lynn E. Rzonca
Admitted pro hac vice

LER/jhw

Defendant is granted leave to file the proposed redacted versions of its opposition and attached exhibits publicly, and to file the unredacted versions under seal.

SO ORDERED.

A handwritten signature in blue ink that reads "Paul A. Engelmayer". The signature is written in a cursive, flowing style.

PAUL A. ENGELMAYER
United States District Judge

May 11, 2020